

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Brenda Lee Sims, Debtor**

**Case No. 24-51602-KMS  
CHAPTER 13**

**NOTICE**

Debtor has filed papers with the court to Modify their Chapter 13 Bankruptcy Plan.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to amend the Plan, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk  
U.S. Bankruptcy Court  
Thad Cochran United States Courthouse  
501 E. Court St., Ste 2.300  
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Modify Plan.

Date: June 9, 2025

Signature:

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer Ann Curry Calvillo (MSBN 104367)  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Brenda Lee Sims, Debtor**

**Case No. 24-51602-KMS  
CHAPTER 13**

**MOTION TO MODIFY BANKRUPTCY PLAN**

COMES NOW, Debtor, by and through counsel, and moves this Court to modify their Chapter 13 plan, and in support thereof, would show the Court as follows:

1. Debtor commenced this case on November 5, 2024 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. U.S. Small Business Administration filed a Proof of Claim on June 2, 2025 (Claim #20).
3. Debtor wishes to modify the Confirmed Plan (Dk# 36) to pay the mortgage in full over the life of the plan pursuant to the claim filed.
4. Notwithstanding the increase in the monthly payment amount, the Confirmed Plan provisions regarding the distribution to unsecured creditors should remain unchanged.
5. The Chapter 13 Trustee should retain discretion to issue a wage order or other otherwise increase the payment amount of the Modified Payment.
6. Except as expressly modified herein, all other terms of the Confirmed Plan should remain unchanged and in full force and effect.

WHEREFORE, Debtor prays that their Bankruptcy Plan be modified to reflect the above-mentioned changes and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:

Thomas C. Rollins, Jr.  
Jennifer Ann Curry Calvillo  
The Rollins Law Firm, PLLC  
P.O Box 13767  
Jackson, MS 39236  
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Modify Plan was forwarded on June 9, 2025, to:

U.S. Small Business Administration  
200W. Santa Ana Blvd., Ste 740  
Santa Ana, CA 92701

U.S. Small Business Administration  
c/o U.S. Attorney  
501 East Court St, Ste 4.430  
Jackson, MS 39201

U.S. Attorney General  
U.S. Dept. of Justice  
950 Pennsylvania Ave. NW  
Washington, DC 20503-0001

By Electronic CM/ECF Notice:

David Rawlings

U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

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4 UNITED STATES BANKRUPTCY COURT  
5 SOUTHERN DISTRICT OF MISSISSIPPI  
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10 IN RE:  
11 Brenda Lee Sims12 CASE NO: 24-51602  
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14 **DECLARATION OF MAILING**  
15 **CERTIFICATE OF SERVICE**  
16 Chapter: 1317  
18 On 6/9/2025, I did cause a copy of the following documents, described below,  
19 Notice and Motion to Modify Plan20  
21  
22 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with  
23 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and  
incorporated as if fully set forth herein.24 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.  
25 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to  
26 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if  
27 fully set forth herein.28 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been  
served electronically with the documents described herein per the ECF/PACER system.

29 DATED: 6/9/2025

30  
31 /s/ Thomas C. Rollins, Jr.  
32 Thomas C. Rollins, Jr.33  
34 The Rollins Law Firm  
35 702 West Pine St  
36 Hattiesburg, MS 39401  
37 601 500 5533  
38 trollins@therollinsfirm.com

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3       **UNITED STATES BANKRUPTCY COURT**  
4       **SOUTHERN DISTRICT OF MISSISSIPPI**  
56       IN RE:  
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8       Brenda Lee Sims  
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106       CASE NO: 24-51602  
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86       **CERTIFICATE OF SERVICE**  
7       **DECLARATION OF MAILING**  
86       Chapter: 13  
7  
811      On 6/9/2025, a copy of the following documents, described below,  
12      Notice and Motion to Modify Plan  
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1819      were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient  
20      postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth  
herein.21      The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above  
22      referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of  
Service and that it is true and correct to the best of my knowledge, information, and belief.23      DATED: 6/9/2025  
24  
2526        
2728      Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

U.S. SMALL BUSINESS ADMINISTRATION  
200W. SANTA ANA BLVD., STE 740  
SANTA ANA CA 92701

FIRST CLASS

U.S ATTORNEY GENERAL  
U.S. DEPT. OF JUSTICE  
950 PENNSYLVANIA AVE. NW  
WASHINGTON DC 20503-0001

FIRST CLASS

U.S. SMALL BUSINESS ADMINISTRATION  
C/O U.S. ATTORNEY  
501 EAST COURT ST, STE 4.430  
JACKSON MS 39201